

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RENA SAMPAYAN,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS, LLC;
COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS; MICHELIN NORTH
AMERICA, INC.; NOKIAN TYRES PLC;
NOKIAN TYRES INC; NOKIAN TYRES U.S.
OPERATIONS LLC; THE GOODYEAR TIRE &
RUBBER COMPANY; PIRELLI & C. S.P.A.;
PIRELLI TIRE LLC; BRIDGESTONE
CORPORATION; BRIDGESTONE AMERICAS,
INC.; AND DOES 1-100,

Defendants.

Case No. 1:24-cv-00881-ER

Judge: Hon. Edgardo Ramos

CATIP ISLAMI,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS, LLC;
COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS MICHELIN SCA;
COMPAGNIE FINANCIÈRE MICHELIN SA;
MICHELIN NORTH AMERICA, INC.; NOKIAN
TYRES PLC; NOKIAN TYRES INC.; NOKIAN
TYRES U.S. OPERATIONS LLC; THE
GOODYEAR TIRE & RUBBER COMPANY;
PIRELLI & C. S.P.A.; PIRELLI TIRE LLC;
BRIDGESTONE CORPORATION;
BRIDGESTONE AMERICAS, INC.; AND DOES
1-100,

Defendants.

Case No. 1:24-cv-00967

JAMES ALFORD, individually and on behalf of all
other similarly situated,

Plaintiff,

v.

BRIDGESTONE CORPORATION;
BRIDGESTONE AMERICAS, INC.;
CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS, LLC;
COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS MICHELIN SCA;
COMPAGNIE FINANCIÈRE MICHELIN SA;
MICHELIN NORTH AMERICA, INC.; NOKIAN
TYRES PLC; NOKIAN TYRES INC; NOKIAN
TYRES U.S. OPERATIONS LLC; THE
GOODYEAR TIRE & RUBBER COMPANY;
PIRELLI & C. S.P.A.; PIRELLI TIRE LLC; AND
DOES 1-100,

Defendants.

Case No. 1:24-cv-01038

MICHELE EDWARDS, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS, LLC;
COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS; MICHELIN NORTH
AMERICA, INC.; NOKIAN TYRES PLC;
NOKIAN TYRES INC; NOKIAN TYRES U.S.
OPERATIONS LLC; THE GOODYEAR TIRE &
RUBBER COMPANY; PIRELLI & C. S.P.A.;
PIRELLI TIRE LLC; BRIDGESTONE
CORPORATION; BRIDGESTONE AMERICAS,
INC.; AND DOES 1-100,

Defendants.

Case No. 1:24-cv-01092

MARCO A. TORRES, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS, LLC;
COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS; MICHELIN NORTH
AMERICA, INC.; NOKIAN TYRES PLC;
NOKIAN TYRES INC; NOKIAN TYRES U.S.
OPERATIONS LLC; THE GOODYEAR TIRE &
RUBBER COMPANY; PIRELLI & C. S.P.A.;
PIRELLI TIRE LLC; BRIDGESTONE
CORPORATION; BRIDGESTONE AMERICAS,
INC.; DOES 1-100,

Defendants.

Case No. 1:24-cv-01124

SUSAN DAVIDOV and ROBERT FURST,
Individually and On Behalf of All Others Similarly
Situated,

Plaintiffs,

v.

CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS, LLC;
COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS; MICHELIN NORTH
AMERICA, INC.; NOKIAN TYRES PLC;
NOKIAN TYRES INC; NOKIAN TYRES U.S.
OPERATIONS LLC; THE GOODYEAR TIRE &
RUBBER COMPANY; PIRELLI & C. S.P.A.;
PIRELLI TIRE LLC; BRIDGESTONE
CORPORATION; BRIDGESTONE AMERICAS,
INC.; AND DOES 1-100,

Defendants.

Case No. 1:24-cv-01367

MICHAEL CURRAN and TIMOTHY
BORLAND, individually and behalf of all others
similarly situated,

Plaintiffs,

v.

THE GOODYEAR TIRE & RUBBER
COMPANY; COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS MICHELIN SCA;
MICHELIN NORTH AMERICA INC.;
BRIDGESTONE CORPORATION;
BRIDGESTONE AMERICAS, INC.;
CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS, LLC;
NOKIAN TYRES PLC; NOKIAN TYRES
NORTH AMERICA, INC.; NOKIAN TYRES
INC.; NOKIAN TYRES U.S. OPERATION LLC;
PIRELLI & C. S.P.A; PIRELLI TIRE LLC;
HANKOOK TIRE & TECHNOLOGY CO., LTD.;
HANKOOK TIRE AMERICA CORP.;
YOKOHAMA RUBBER CO., LTD.;
YOKOHAMA TIRE CORPORATION; TOYO
TIRE CORPORATION; TOYO TIRE U.S.A.
CORP.; KUMHO TIRE CO.; KUMHO TIRE
U.S.A.; SUMITOMO RUBBER INDUSTRIES,
LTD.; SUMITOMO RUBBER NORTH
AMERICA, INC.; GITI TIRE GLOBAL
TRADING PTE. LTD.; AND GITI TIRE (USA)
LTD.,

Defendants.

Case No. 1:24-cv-01419

DANIEL PURCELL, LUKE CUDDY, and
ELIZABETH TWITCHELL, Individually and On
Behalf of All Others Individually Situated,

Plaintiffs,

v.

CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS, LLC;
COMPAGNIE GÉNÉRALE DES

Case No. 1:24-00938

ÉTABLISSEMENTS; MICHELIN NORTH AMERICA, INC.; NOKIAN TYRES PLC; NOKIAN TYRES INC; NOKIAN TYRES U.S. OPERATIONS LLC; THE GOODYEAR TIRE & RUBBER COMPANY; PIRELLI & C. S.P.A.; PIRELLI TIRE LLC; BRIDGESTONE CORPORATION; BRIDGESTONE AMERICAS, INC.; AND DOES 1-100,

Defendants.

WILKERSON FARMS ET, LLC, on behalf of itself and all others similarly situated,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT; CONTINENTAL TIRE THE AMERICAS, LLC; COMPAGNIE GÉNÉRALE DES ÉTABLISSEMENTS; MICHELIN NORTH AMERICA, INC.; NOKIAN TYRES PLC; NOKIAN TYRES INC; NOKIAN TYRES U.S. OPERATIONS LLC; THE GOODYEAR TIRE & RUBBER COMPANY; PIRELLI & C. S.P.A.; PIRELLI TIRE LLC; BRIDGESTONE CORPORATION; BRIDGESTONE AMERICAS, INC.; AND DOES 1-100,

Defendants.

Case No. 1:24-00970

FRANK NOVAK, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT; CONTINENTAL TIRE THE AMERICAS, LLC; COMPAGNIE GÉNÉRALE DES ÉTABLISSEMENTS; MICHELIN NORTH AMERICA, INC.; NOKIAN TYRES PLC;

Case No. 1:24-cv-01202

NOKIAN TYRES INC.; NOKIAN TYRES U.S. OPERATIONS LLC; THE GOODYEAR TIRE & RUBBER COMPANY; PIRELLI & C. S.P.A.; PIRELLI TIRE LLC; BRIDGESTONE CORPORATION; BRIDGESTONE AMERICAS, INC.; AND DOES 1-100,

Defendants.

MICHAEL SPADAFINO, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT; CONTINENTAL TIRE THE AMERICAS, LLC; COMPAGNIE GÉNÉRALE DES ÉTABLISSEMENTS; MICHELIN NORTH AMERICA, INC.; NOKIAN TYRES PLC; NOKIAN TYRES INC; NOKIAN TYRES U.S. OPERATIONS LLC; THE GOODYEAR TIRE & RUBBER COMPANY; PIRELLI & C. S.P.A.; PIRELLI TIRE LLC; BRIDGESTONE CORPORATION; BRIDGESTONE AMERICAS, INC.; AND DOES 1-100,

Defendants.

Case No. 1:24-cv-01452

LAURA AMMONS, BRANDON DERRICK, LETIA DICKERSON, JEFFREY HOLT, JERRY MERKEL, and LYNN SEDA, Individually and On Behalf of All Others Similarly Situated,

Plaintiffs,

v.

CONTINENTAL AKTIENGESELLSCHAFT; CONTINENTAL TIRE THE AMERICAS, LLC; COMPAGNIE GÉNÉRALE DES ÉTABLISSEMENTS; MICHELIN NORTH AMERICA, INC.; NOKIAN TYRES PLC;

Case No. 1:24-cv-01513

NOKIAN TYRES INC; NOKIAN TYRES U.S.
OPERATIONS LLC; THE GOODYEAR TIRE &
RUBBER COMPANY; PIRELLI & C. S.P.A.;
PIRELLI TIRE LLC; BRIDGESTONE
CORPORATION; BRIDGESTONE AMERICAS,
INC.; AND DOES 1-100,

Defendants.

**DECLARATION OF DENA C. SHARP IN SUPPORT OF MOTION FOR CONSOLIDATION
AND COORDINATION OF THE DIRECT PURCHASER AND INDIRECT PURCHASER
ACTIONS**

I, Dena C. Sharp, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner in the law firm of Girard Sharp LLP and one of the attorneys of record for Plaintiff Rena Sampayan in the action titled *Sampayan v. Continental Aktiengesellschaft, et al.*, No. 1:24-cv-00881. I submit this declaration in support of the accompanying Motion for Consolidation and Coordination of the Direct Purchaser and Indirect Purchaser Actions. I have personal knowledge of the facts stated herein and, if called upon to do so, could and would testify competently thereto.

2. Plaintiffs' counsel for the Related Direct Purchaser and Related Indirect Purchaser Actions have conferred among themselves and no party opposes the relief sought.

3. Plaintiffs' counsel for the Related Direct Purchaser and Related Indirect Purchaser Actions have also conferred with counsel for the Defendants who have appeared to date, who take no position with respect to the relief sought in this motion.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: March 13, 2024

/s/ Dena C. Sharp
Dena C. Sharp

CERTIFICATE OF SERVICE

I, Gregory B. Linkh, hereby certify that on March 13, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to all registered users.

/s/ Gregory B. Linkh